

17. Attached hereto (as Exhibit 8) are letters written by Representatives William Thomas and Congressman David Dreier on Community's behalf urging the FCC to act favorably on Community's Channel 39 application, at a time when the application constituted a restricted proceeding.^{9/} If Community's argument set forth in its petition were adopted, Community itself would be guilty of violation of the ex parte rules and its character qualifications to hold a license for television station Channel 39 would be in question.

IV. Community's Petition Is One More Step
In Its Ongoing Battle To Stifle
Off-The-Air Service To Bakersfield

18. Community has petitioned against the Commission granting either the Channel 36 or Channel 65 television translator proposal for Bakersfield to Valley. Additionally, after filing the petition to deny against Valley's Channel 36 application, in the following window period, Community filed a late application for consideration as a Channel 36 television translator applicant, even though it had previously argued that a Channel 36 translator proposal could not even be considered, much less granted. Throughout the several years involved in these battles, Community's bullying tactics clearly have been to cause delay and create obstacles in Valley's ability to serve the Bakersfield area--a clear case of the abuse of the Commission's processes.

^{9/} The proceeding became restricted on December 30, 1988, when Valley filed a mutually exclusive application.

19. There is no reason for such outrageous tactics other than Community's financial greed and its insistence that the Bakersfield area's public television service be met only through the cable carriage of Community's Los Angeles station signal. The public interest is solely abused by the waste of limited public broadcast resources sought by Community in order to carry on its vendetta against the efforts of Valley to provide a free over-the-air service.

Conclusion

Community's petition is so factually incorrect and without basis that it must be recognized that it has engaged in an abuse of the Commission's processes. Community's requests for a lottery and a hearing are outrageous delay tactics from a party without standing intended to prevent Valley from serving the Bakersfield area through its Channel 65 translator proposal.

Therefore, Valley requests that the Commission dismiss Community's petition as without cause.

VALLEY PUBLIC TELEVISION, INC.

By: 

Richard Hildreth

By: 

Lonna M. Thompson

Its Attorneys

FLETCHER, HEALD & HILDRETH
1225 Connecticut Avenue, N.W.
Suite 400
Washington, D.C. 20036-2679
(202) 828-5700

October 1, 1990

MAC/LMT/11/VALLEY.OPD

DECLARATION

I, Colin Dougherty, declare under penalty of perjury that the information contained in the Opposition of Valley Public Television, Inc. to the Petition to Deny of Community Television of Southern California is true and correct to the best of my information, knowledge, and belief.


Colin DoughertyDate: 10-1-98

NOTE: ORIGINAL WILL BE FILED UPON RECEIPT.

EXHIBIT 1

Engineering Statement of
Moffet, Larson & Johnson, Inc.

ENGINEERING REPORT

MOFFET, LARSON & JOHNSON, INC.

5203 LEESBURG PIKE

CONSULTING TELECOMMUNICATIONS ENGINEERS

FALLS CHURCH, VA 22041

ENGINEERING STATEMENT

PREPARED ON BEHALF OF

VALLEY PUBLIC TELEVISION, INC.

IN RESPONSE TO

COMMUNITY TELEVISION OF SOUTHERN CALIFORNIA'S

PETITION TO DENY

THE

APPLICATION BPTT-8912084Q

September 26, 1990

MOFFET, LARSON & JOHNSON, INC.

5203 LEESBURG PIKE

CONSULTING TELECOMMUNICATIONS ENGINEERS

FALLS CHURCH, VA 22041

Valley Public Television, Inc.
Bakersfield, California

ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of Valley Public Television, Inc. (KVPT) in response to a Petition to Deny the KVPT application BPTT-8912084Q for a new Low Power TV Station in Bakersfield, California filed by Community Television of Southern California (Community).

Community claims that the Bakersfield proposal's interference contour will overlap the service contour of a proposed co-channel Low Power Television Station in San Fernando, California. The San Fernando application was originally filed July 2, 1987 and assigned the file number BPTTL JA0702TL. This application was amended on December 8, 1989 and assigned the file number BPTTL 8912083Y.

Community bases its overlap calculations on the assumption that the Bakersfield and San Fernando proposals do not specify frequency offset. In fact, the Bakersfield proposal specifies plus offset and the San Fernando application proposes minus offset. The correct desired to undesired ratio needed to protect the San Fernando proposal is 28 dB. Therefore, the Bakersfield interfering contour is the 46 dBu contour.

Community also uses an antenna radiation center of 2,994 meters for the Bakersfield proposal. The correct radiation center of the Bakersfield proposal is 2,294 meters.

Tabulated below are the calculations of the distances to the Bakersfield interfering contour and the San Fernando service contour along the path between the two proposals.

<u>Proposal</u>	<u>HAAT</u> <u>meters</u>	<u>Effective</u> <u>Radiated</u> <u>Power (kw)</u>	<u>Distance to Contour (km)</u>	
			<u>74 dBu (50,50)</u>	<u>46 dBu (50,10)</u>
Bakersfield	1179	0.91		93.6
San Fernando	686	0.43	16.4	

The distance between the two proposals is 123.1 kilometers. The sum of distance to the Bakersfield interfering contour and the distance to the San Fernando service contour is 110.0 kilometers. Therefore there is a clearance of 13.1 kilometers between the two contours and no overlap will occur.

MOFFET, LARSON & JOHNSON, INC.

5203 LEESBURG PIKE

CONSULTING TELECOMMUNICATIONS ENGINEERS

FALLS CHURCH, VA 22041

Valley Public Television, Inc.
Bakersfield, California

A F F I D A V I T

COUNTY OF FAIRFAX)
) SS:
COMMONWEALTH OF VIRGINIA)

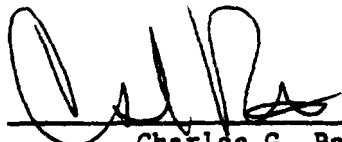
CHARLES G. PERRY, III, being duly sworn upon oath deposes and says:

That he has a Bachelor's degree in Electrical Engineering from the University of Tennessee and that he is a registered professional engineer in the State of Virginia;

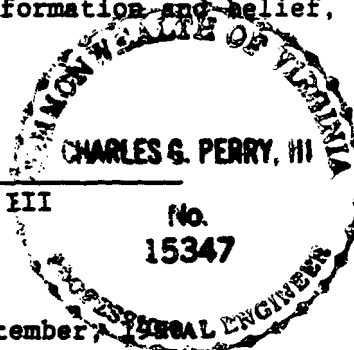
That he is corporate vice-president of the firm of Moffet, Larson & Johnson, Inc., consulting telecommunications engineers;

That this firm has been retained by Valley Public Television, Inc. to prepare this engineering statement;

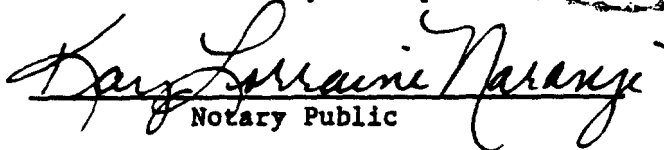
That he has either prepared or directly supervised the preparation of all technical information contained in this engineering statement; and that the facts stated in this engineering statement are true of his knowledge, except as to such statements as are herein stated to be on information and belief, and as to such statements he believes them to be true.



Charles G. Perry, III



Subscribed and sworn to before me this 27th day of September, 1994.



Notary Public

My Commission expires October 31, 1994.

MOFFET, LARSON & JOHNSON, INC.

5203 LEESSBURG PIKE

CONSULTING TELECOMMUNICATIONS ENGINEERS

FALLS CHURCH, VA 22041

Valley Public Television, Inc.
Bakersfield, California

A F F I D A V I T

COUNTY OF FAIRFAX :)
) SS:
COMMONWEALTH OF VIRGINIA)

MICHAEL B. DEGITZ, being duly sworn upon oath deposes and says:

That he is corporate secretary of the firm of Moffet, Larson & Johnson, Inc., consulting telecommunications engineers;

That this firm has been retained by Valley Public Television, Inc. to prepare this engineering statement;

That he has either prepared or directly supervised the preparation of all technical information contained in this engineering statement; and that the facts stated in this engineering statement are true of his knowledge, except as to such statements as are herein stated to be on information and belief, and as to such statements he believes them to be true.


Michael B. Degitz

Subscribed and sworn to before me this 27th day of September, 1990.


Notary Public

My Commission expires October 31, 1994.

EXHIBIT 2

Valley Public Television, Inc.
Frequency Plus Offset Amendment,
Channel 65, Bakersfield, California

June 25, 1990

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Suite 222
1919 M Street, N.W.
Washington, D.C. 20554

Dear Ms. Searcy:

On behalf of Valley Public Television, Inc. (formerly KMTF(TV), Channel 18, Inc.) there is transmitted herewith an original and two copies of an amendment to its application to construct and operate a new television translator station to operate on Channel 65 at Bakersfield, California, File No. 8912084Q. This amendment changes the frequency offset from "No offset" to "Plus offset".

If any questions should arise concerning this submission, please communicate with this office.

Very truly yours,

Richard Hildreth

Enclosure

cc: Mr. Keith Larson (w/enc.)

bc: Mr. Colin Dougherty (w/enc.)*

* Please place a copy in your station's Public File.

~~FILED - VALLEY PUBLIC TELEVISION, INC. 11260~~
bII/rh05/KVPT

RECEIVED

JUN 25 1990

COPY FILED BY
FLETCHER, HEALD & HILDRETH

AMENDMENT

Federal Communications Commission
Washington, D.C. 20541

Valley Public Television, Inc. (formerly KMTF, Channel 18, Inc.) hereby amends its application for a new television translator station to operate on Channel 65 at Bakersfield, California, File No. 8912084Q, as follows:

FCC Form 346, Section II, page 2, item 1 is amended in connection with the frequency offset by deleting "No offset" and substituting "Plus offset".

VALLEY PUBLIC TELEVISION, INC.

Signed and dated this
19th day of June, 1990

By

Carolyn Golden

Title: Board Secretary

EXHIBIT 3

Relevant Portions of Amendment of
White Sage Broadcasting Company,
Channel 65, San Fernando,
Including Frequency Minus Offset

APPLICATION FOR AUTHORITY TO CONSTRUCT OR
MAKE CHANGES IN A LOW POWER TV, TV TRANSLATOR OR TV BOOSTER STATION
(Carefully read instructions before filling out form - RETURN ONLY FORM TO FCC)

For Commission Fee Use Only MELLONE D.C. 081989 RECEIVED	FE	For Applicant Fee Use Only
	FEE TYPE: C	Is a fee submitted with this application? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	FEE AMT: 375.00	If No, indicate reason therefor (check one box): <input type="checkbox"/> Nonfeeable application
	ID SEQ: 16	Fee Exempt (See 47 C.F.R. Section 1.1112) <input type="checkbox"/> Noncommercial educational licensee <input type="checkbox"/> Governmental entity

SECTION 1 - GENERAL INFORMATION

For Commission Use Only
File No. 177-891000

1. Name of Applicant White Sage Broadcasting Company	Address 23642 Calabasas Road, Suite 104		
	City Calabasas	State CA	Zip Code 91302
	Telephone No. (include area code) 818-884-3818		

2. This application is for: (check one box)

☒ Low Power Television ☐ TV Translator ☐ TV Booster

(a) Proposed Channel No. 65	(b) Community to be served: City San Fernando State CA	
------------------------------------	--	--

(c) Check one of the following boxes:

- ☐ Application for NEW station
- ☐ MAJOR change in licensed facilities; call sign: _____
- ☐ MINOR change in licensed facilities; call sign: _____

SECTION II - ENGINEER'S DATA AND ANTENNA AND SITE INFORMATION

1. Facilities requested:

Output Channel No.	Transmitter Rated Power Output	Proposed Community(ies) to be served	
65	1.0 kilowatts	City San Fernando	State CA

Frequency Offset (check one)

☐

No offset

☐

Zero offset

☐

Plus offset

☒

Minus offset

Translator Input Channel No.

DNA

2. Proposed transmitting antenna location:

City Angeles National Forest	State CA	County Los Angeles
Address or other description of location: Loop Canyon Ridge Radio Site		Geographical coordinates of transmitting antenna to nearest second North Latitude 34° 21' 13" West Longitude 118° 24' 57"

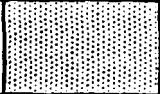
Attach as an Exhibit a map or maps (preferably topographic, if obtainable, such as Geological Survey quadrangles) of the area of the proposed transmitting antenna location shown drawn thereon the following data:

Exhibit No.

a. Scale of kilometers

b. Proposed transmitting antenna location accurately plotted.

No change

3. Transmitter:	Make TTC	Type No. XL1000MU		Output Power P 0.550 kilowatts
4. Transmission line:	Andrew	LDF4-50A	Length 32m	Rated efficiency E for length given (decimal fraction) 0.61

5. Transmitting antenna

☒Directional
"off-the-shelf"☐Directional Composite
(Multiple Antennas)☐

Non-Directional

Manufacturer Rogers	Model R411D	Description 8 element slot array
------------------------	----------------	-------------------------------------

Section 11 (Page 2)

6. Attach as an Exhibit a vertical plan sketch for the proposed total antenna structure, including supporting structure, giving overall height of structure in meters above ground, including lighting beacon (if any).

Exhibit No.
E2

7. Will the proposed antenna supporting structure be shared with an AM radio station?

☐ Yes ☒ No

If yes, list the call sign of that station. _____

8. Attach as an Exhibit a polar diagram of the radiation pattern (relative field) in the horizontal plane of the transmitting antenna showing clearly the correct relationship between the major lobe or lobes and the minor lobes of radiation and a tabulation of the pattern at every ten degrees and all maxima and minima. Applicants proposing use of multiple transmitting antennas shall submit a composite radiation pattern. If a non-directional transmitting antenna will be employed, i.e., an antenna with an approximately circular radiation pattern, check here ☐ and omit polar diagram and tabulation. If the antenna manufacturer and model number are on the Commission's list of common "off-the-shelf" directional antennas, check here ☒ and omit polar diagram and tabulation.

Exhibit No.

9. Has FAA been notified of proposed construction?

☐ Yes ☒ No

If Yes, give date and office where notice was filed: _____

10. Environmental Statement (See 47 C.F.R. Section 1.1301 et seq)

Would a Commission grant of this application come within 47 C.F.R. 1.1307, such that it may have a significant environmental impact, including exposure to workers or the general public to harmful nonionizing radiation levels?

☐ Yes ☒ No

If you answer Yes, submit as an Exhibit an Environmental Assessment as required by Section 1.1311. If no, explain briefly why not.

Exhibit No.

The antenna will be mounted on an existing radio site structure with no increase in the overall height of the structure. Nonionizing field levels at ground level will be adequately suppressed.

EXHIBIT 4

Relevant Portions of Application of
Valley Public Television, Inc.,
Channel 65, Bakersfield, California,
Including Antenna Height

APPLICATION FOR AUTHORITY TO CONSTRUCT OR
MAKE CHANGES IN A LOW POWER TV, TV TRANSLATOR OR TV BOOSTER STATION
(Carefully read instructions before filling out form - RETURN ONLY FORM TO FCC)

For <u>Commission</u> Fee Use Only	FEE NO:	For <u>Applicant</u> Fee Use Only Is a fee submitted with this application? <input type="checkbox"/> Yes <input type="checkbox"/> No If No, indicate reason therefor (check one box): <input type="checkbox"/> Nonfeasible application Fee Exempt (See 47 C.F.R. Section 1.1112): <input type="checkbox"/> Noncommercial educational licensee <input type="checkbox"/> Governmental entity
	FEE TYPE:	
	FEE AMT:	
	ID SEQ:	

For Commission Use Only

File No.

SECTION I - GENERAL INFORMATION

1. Name of Applicant KMTF Channel 18, Inc.	Address 733 L Street		
	City Fresno	State CA	Zip Code 93721
	Telephone No. (include area code) (209) 266-1800		

2. This application is for: (check one box)

☐ Low Power Television ☒ TV Translator ☐ TV Booster

(a) Proposed Channel No. 65	(b) Community to be served: City Bakersfield	State CA
--------------------------------	--	-------------

(c) Check one of the following boxes:

- ☒ Application for NEW station
- ☐ MAJOR change in licensed facilities; call sign: _____
- ☐ MINOR change in licensed facilities; call sign: _____
- ☐ MAJOR modification of construction permit; call sign: _____
File No. of Construction Permit: _____
- ☐ MINOR modification of construction permit; call sign: _____
File No. of Construction Permit: _____
- ☐ AMENDMENT to pending application; Application file number: _____

NOTE: It is not necessary to use this form to amend a previously filed application. Should you do so, however, please submit only Sections I and VII and those other portions of the form that contain the amended information.

SECTION 11 - ENGINEER DATA AND ANTENNA AND SITE INFORMATION

1. Facilities requested:

Output Channel No.	Transmitter Rated Power Output	Proposed Community(ies) to be served	
65	1.0 kilowatts	City Bakersfield	State CA

Frequency Offset (check one)

☒ No offset

 ☐ Zero offset

 ☐ Plus offset

 ☐ Minus offset
Translator Input Channel No. 18

2. Proposed transmitting antenna location:

City Bakersfield	State CA	County Kern
Address or other description of location: Breckenridge Mountain 38.6 km northeast of Bakersfield, California		Geographical coordinates of transmitting antenna to nearest second North Latitude West Longitude <u>35</u> ° <u>27</u> ' <u>14</u> " <u>118</u> ° <u>35</u> ' <u>37</u> "

Attach as an Exhibit a map or maps (preferably topographic, if obtainable, such as Geological Survey quadrangles) of the area of the proposed transmitting antenna location shown drawn thereon the following data:

Exhibit No.
1

- a. Scale of kilometers _____
 b. Proposed transmitting antenna location accurately plotted.

3. Transmitter:	Make Information Transmission	Type No. ITS-232		Output Power P 1.0 kilowatts
4. Transmission line:	Andrew	LDF7-50	Length 9.1 m	Rated efficiency E for length given (decimal fraction) 0.955

 5. Transmitting antenna ☒ Directional "off-the-shelf"

 ☐ Directional Composite (Multiple Antennas)

 ☐ Non-Directional

Manufacturer Bogner		Model B8UC		Description ¹ Stack Vertical Slots
Orientation of main lobe ² 270	Overall antenna structure height above ground ³ 14 meters	Elevation of Site ⁴ 2282 meters	Power gain G (multiplier) in the horizontal lobe of maximum radiation relative to a halfwave dipole ⁵ 28.5 (14.5 dBd) 2° of beam tilt is employed	

Effective radiated power (ERP)
 (ERP = P X E X G) 27.2 kilowatts

Height of antenna radiation center above ground 12 meters
 Height of antenna radiation center above above mean sea level 2294 meters⁶

¹ Give basic type using general descriptive terms such as half-wave dipole, "bow-tie" with screen, corner reflector, 10 element Yagi, 4 element in-phase array, two stacked 5 element Yagis, etc.

² For directional antennas in the horizontal plane show the direction of the main radiation lobe(s) in degrees with respect to true north in a 360 degree horizontal azimuth, numbered clockwise, with true north as zero azimuth.

³ Show overall height above ground in meters to topmost portion of structure, including highest top mounted antenna and beacon if any.

⁴ Show the ground elevation above mean sea level in meters at the base of the transmitting antenna supporting structure.

⁵ Give the actual power gain toward the radio horizon.

⁶ This is equal to the sum of the site elevation and the height of the antenna radiation center above ground.

EXHIBIT 5

Colin Dougherty Letter to
Congressman Pashayan
Requesting Service on KCET



KMTF

PUBLIC TELEVISION FOR THE SAN JOAQUIN VALLEY
733 L Street • Fresno, California 93721 • (209) 266-1800

Colin Dougherty, General Manager

October 16, 1989

OCT 20 1989

6
The Honorable Charles Pashayan
Member, U.S. Congress
129 Cannon House Office Building
Washington, D.C. 20515

Dear Congressman Pashayan:

KCET Los Angeles petitioned the Federal Communications Commission to deny a construction permit to KMTF Fresno for a new television translator asking the FCC to deny the residents of Kern County the only local broadcast capability to receive free public television. KMTF and KCET were both recently denied, and applications returned by the FCC, license for Channel 39 in Kern County on the basis of a "freeze" in advanced television systems; 2 FCC Rcd 6520 (1988). This freeze covers the top 30 television markets in the Nation and geographic areas of 150 miles radius of those markets to allow research and evaluation of what is called High Definition Television (HDTV). Both stations can appeal the freeze, but the possibility of the Commission lifting this order is highly unlikely, due to the impact of HDTV in the next decade.

With the "letter perfect" objection, KCET has become a self-appointed watchdog and "gofer" for the FCC. KCET's objection is a direct and avaricious attempt to undermine the awarding of a translator license to KMTF which would have been announced on September 1st. KMTF must now face further delays in constructing and providing free local public television to Kern County.

With KCET's recent license denial by the FCC, and considering terrain problems and their distance from Kern County, KCET is not in a position to serve any residents of the City of Bakersfield and Kern County with a broadcast signal. It appears KCET's only interest is to preserve its cable position and income now generated in that area. On page 3, footnote 5 of the request to deny they say, "CTSC also presently enjoys widespread cable television carriage in the Bakersfield area. If its signal is replaced by KMTF's translator, a substantial number of contributors to CTSC will no longer receive the station and CTSC will lose their valuable contributions." KMTF has stated repeatedly that Kern County residents would have the best of both worlds: KCET on cable for those that have it and KMTF for those unable to afford it.

This "letter perfect" charon and the so-called discrepancy under this

EXHIBIT 6

Colin Dougherty Letter to Senator Wilson
Dated Prior to Date of Restriction



KMTF

PUBLIC TELEVISION FOR THE SAN JOAQUIN VALLEY

733 L Street • Fresno, California 93721 • (209) 266-1800

John Dougherty, General Manager

June 9, 1989

The Honorable Pete Wilson
United States Senator
720 Hart Senate Office Building
Washington D.C. 20510

Attention: Ira Goldman, Counsel

Dear Senator Wilson:

RE: FCC Application by KMTF Channel 18, Inc. for
License to Construct Translator, Channel 36
Bakersfield, California
Application #JC0624QF

I am requesting your assistance in securing the above-named license from the FCC for a television translator on Channel 36 located in Bakersfield/Kern County, California.

This application was originally submitted to the FCC on June 25, 1987 to provide non-commercial public television to the communities of Bakersfield and Western Kern County, designated as an "unserved" area by the Public Broadcasting Service. A competing application for Channel 36 at that time, a commercial television station located in Santa Barbara, California, was selected in a Commission lottery on November 3, 1987.

On June 23, 1988 we resubmitted the translator application for Channel 36, showing the Commission that terrain shielding would prevent any interference being caused to, or received from, the Santa Barbara station which had been granted license. We have supplied the Commission with agreements and topography information to assure non-interference. As of this date, we have not received any information from the Commission regarding KMTF's reapplication.

On our behalf, would your office inquire at the FCC to ascertain the status, and request approval, of our application for this needed service to Bakersfield/Kern County.

KMTF's Washington D.C. based attorney is: Richard Hildreth, Attorney; Fletcher, Heald

EXHIBIT 7

Counsel for Valley Public Television, Inc.
Letter to Counsel for Community Television
of Southern California Transmitting Congressional Letter

JUL D.P. SPEARMAN
(1938-1988)
FRANK ROBERSON
(1938-1981)
MANA K. SACHSAGI
JOEL H. BERNSTEIN
VINCENT J. CURTIS, JR.
ROBERT A. DUPONT
THOMAS J. DOUGHERTY, JR.
JAMES G. ENNIS
ANNE E. GOODWIN
RICHARD HILDRETH
EDWARD W. HUMMERS, JR.
FRANK R. JAZZO
BARRY LAMBERGMAN
CHRISTINE O. McLAUGHLIN
PATRICIA A. MAHONEY
JILL R. PENDER*
GEORGE PETRITSAS
ROBERT D. PRIMOSCH
LEONARD R. RAISH
JAMES R. RILEY
JULIE E. RONES*
MARVIN ROSENBERG
STEPHEN R. ROSE
ESTELLA SALVATERRA
TIMOTHY R. SCHNACKE**
*ADMITTED IN PENNSYLVANIA ONLY
**ADMITTED IN KANSAS ONLY

FLETCHER, HEALD & HILDRETH

ATTORNEYS AT LAW

SUITE 400, 1225 CONNECTICUT AVENUE, N.W.

WASHINGTON, D.C. 20038-2879

(202) 828-5700

RETIRED
RUSSELL POWELL
EDWARD F. KENEHAN
ROBERT L. HEALD
FRANK U. FLETCHER

COUNSEL
ROBERT J. RAWSON

SPECIAL COUNSEL
JAMES L. HOFFMAN, JR. +
+ ADMITTED IN IOWA ONLY

TELECOMMUNICATIONS CONSULTANT
HON. ROBERT E. LEE

TELESCOPE NUMBER
(202) 828-5788

WRITER'S NUMBER
(202) 828-

November 27, 1989

Peter Tannenwald, Esquire
Arent, Fox, Kintner, Plotkin
& Kahn
1050 Connecticut Avenue, N.W.
Suite 600
Washington, D.C. 20036

Dear Peter:

I am enclosing a copy of the letter that was sent to Chairman Sikes of the FCC concerning the application of KMTF to construct a television translator station to operate on Channel 36 at Bakersfield, California. Your firm opposed that application on behalf of KCET-TV.

Although it is our position that KCET-TV does not have standing to file the said opposition and therefore the ex parte rules do not apply, I am enclosing a copy of this letter as a matter of courtesy.

Cordially,


Richard Hildreth

RH/bl1
Enclosure

bc: The Honorable Charles Pashayan, Jr. (with enclosure)
(Attention: Chris Mardeich)
Mr. Colin Dougherty (with enclosure)